



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS TX 75202-2733

NOV 22 2016

Mr. Stuart Spencer
Associate Director
Office of Air Quality
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317

Dear Mr. Spencer:

This letter follows the overall programmatic end-of-year review of the Arkansas Department of Environmental Quality's (ADEQ's) air quality program. This review documents the State's progress toward meeting the negotiated 2016 work plan commitments in the Arkansas Clean Air Act (CAA), Sect. 105 Cooperative Agreement, as jointly reported by your staff and the U.S. Environmental Protection Agency (EPA), Region 6.

We commend the ADEQ for:

- maintaining the NAAQS.
- Work to develop a SIP revision that would replace some or all elements of the FIP.
- Continued coordination and collaboration with EPA R6 in planning and prioritizing SIP work.
- ADEQ's input on the proposed revisions to the Regional Haze Rule and new guidance.
- Voluntary efforts and use of the resources posted on the Advance website (<https://www.epa.gov/advance>).
- Development, adoption and submittal of the Crittenden County 2008 8-hr Ozone Redesignation Request and Maintenance Plan; especially ADEQ's coordination with EPA R6 which allowed for expedient redesignation of Crittenden County.
- Revisions to Regulation No. 19 to address the current NAAQS.
- Work to characterize air quality for use in designating areas under the 1-hour SO₂ NAAQS.
- Continued efforts in the development of timely, responsive, necessary SIP revisions.
- Work to report real time ozone NO₂, SO₂ and PM_{2.5} data to AirNOW.
- Continuing to communicate with Region 6 Multi-Media Division, Air Monitoring section in advance of monitoring network system modifications.
- Continuing to perform QA/QC and have confirmed the 2015 QA flow rates in AQS.
- Considering expansion of its reporting and forecasting in AirNow to additional cities.
- Continued reporting of NCORE multi-pollutant precursor gas data to AQS.
- Timely response to our requests for Minor NSR permitting documents.
- Commitment to enter in the permit timing information into the RBLC, while also working to identify areas for possible improvement within the clearinghouse.
- ADEQ's on-going commitment to maintain current BACT/LAER information in the RBLC and their identification of information that needs to be updated and/or corrected.

- ADEQ's participation in monthly air permitting conference calls providing the opportunity to discuss current permit actions and the associated NAAQS demonstration requirements.
- Providing draft permit documents in electronic format.
- MACT status update.
- ADEQ's participation in monthly HPV conference calls to discuss HPV cases being pursued consistent with the HPV Policy.
- Ongoing work to conduct all inspections and pursue enforcement actions in accordance with Federal and state laws, regulations & policies.
- Continued work to enter, track and quality assure enforcement and compliance data to the national database, ICIS-Air.

EPA acknowledges:

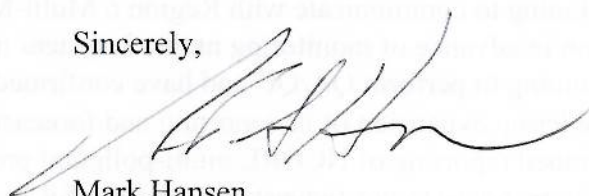
- ADEQ submittal of the 2015 NAAQS certification package for 2015 data before the May 1, 2016 deadline.
- ADEQ has not had missing data collection during this time period.
- ADEQ has not flagged data or notified EPA of a potential exceptional event.
- ADEQ has exceeded number of projected FCEs in FY16.
 - Majors: Projected 110 Actual 125
 - SM80s: Projected 129 Actual 259

EPA has the following concerns:

- AQS does not show any flow rate verifications for 2015 or 2016 and does not show any flow rate audits for Pb-PM₁₀ for 2016. Also, AQS only shows 70% of the flow rate audits for PM_{2.5} for 2016. We look forward to ADEQ submitting the rest of this required data.
- The on time submittal by ADEQ of its Annual Network Plan; the Plan was received July 18, 2016.
- Commitment to notifying EPA in the event of missing data collection.
- Issuance of Minor NSR permits that do not include an adequate NAAQS demonstration as part of the permit record.

We commend you and your staff for your hard work and commitment to protecting the air for the people of Arkansas. We sincerely appreciate your contribution to clean air goals and look forward to continuing a successful partnering with ADEQ in 2016. If you have any questions after reviewing the enclosures, please call me at (214) 665-7548.

Sincerely,



Mark Hansen
Associate Director for Air
Multimedia Division

Enclosures

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY (ADEQ)
AIR POLLUTION CONTROL PROGRAM SUPPORT (APCPS)
CLEAN AIR ACT: SECT.105
FY2016 End-Of-Year Review
A-00614916 (July 1, 2015 – June 30, 2016)

National Goal 1

Taking Action on Climate Change and Improving Air Quality. Reduce greenhouse gas emissions and develop adaptation strategies to address climate change, and protect and improve air quality.

National Objective 1.2:

Improve Air Quality. Achieve and maintain health-based air pollution standards and reduce risk from toxic air pollutants and indoor air contaminants.

ADEQ Item #	SIP/Planning Activity	Output/Reporting Mechanism	Time Frame
1	<p>Review monitoring data and take appropriate actions to address NAAQS violations.</p> <p>ADEQ: No violations have occurred in this reporting cycle.</p> <p>EPA: We appreciate the work done by the ADEQ to maintain the NAAQS.</p>	<p>Periodic Planning Calls</p> <p>End-of-Year Review</p>	Ongoing
2	<p>As appropriate, develop and submit infrastructure SIPs for the 2012 PM_{2.5} NAAQS, the 2008 ozone NAAQS, 2010 NO₂ NAAQS, and 2010 SO₂ NAAQS, if not yet submitted.</p> <p>ADEQ: 2008 O₃, 2010 NO₂, and SO₂ NAAQS Infrastructure SIPs are currently under internal review. We anticipate proposal of the Infrastructure SIPs late summer 2016.</p> <p>EPA: We look forward to receipt of these SIPs.</p>	<p>SIP submittals</p> <p>Periodic Planning Calls</p> <p>End-of-Year Review</p>	Ongoing

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY (ADEQ)
AIR POLLUTION CONTROL PROGRAM SUPPORT (APCPS)
CLEAN AIR ACT: SECT.105
FY2016 End-Of-Year Review
A-00614916 (July 1, 2015 – June 30, 2016)

ADEQ Item #	SIP/Planning Activity	Output/Reporting Mechanism	Time Frame
3	<p>Continue to develop Regional Haze strategy, including development and submission of a SIP revision to submit to EPA to replace the forthcoming regional haze FIP?</p> <p>ADEQ: We are in the process of developing revisions to Regulation 19 to incorporate changes to be included the Regional Haze SIP revision. We anticipate initiating a rulemaking early fall 2016.</p> <p>EPA: EPA appreciates ADEQ's work to develop a SIP revision that would replace some or all elements of the FIP. EPA stands ready to work with ADEQ in the development of this SIP revision.</p>	Periodic Planning Calls	Ongoing
4	<p>As appropriate, work with Region 6 to update the Four-Year SIP Management Plan</p> <p>ADEQ: We submitted feedback to EPA on the Four-Year SIP Management Plan on 4/11/2016. We had a follow-up call on 5/9/2016 with EPA to discuss our recommendations. EPA sent ADEQ a revised SIP Management Plan on 5/19/2016 that incorporated details from our 5/9/2016 discussion.</p> <p>EPA: We appreciate ADEQ's continued coordination and collaboration with EPA R6 in planning and prioritizing SIP work.</p>	<p>Periodic Air Planning and Permitting Conference Calls</p> <p>End-of-Year Review</p>	Ongoing

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY (ADEQ)
AIR POLLUTION CONTROL PROGRAM SUPPORT (APCPS)
CLEAN AIR ACT: SECT.105
FY2016 End-Of-Year Review
A-00614916 (July 1, 2015 – June 30, 2016)

ADEQ Item #	SIP/Planning Activity	Output/Reporting Mechanism	Time Frame
5	<p>Propose revisions to the upset or startup, shutdown, and malfunction (SSM)-related regulations in response to the SIP call petition signed May 22, 2015. As appropriate, submit SIP revisions to revise upset or startup, shutdown and malfunction (SSM) provisions per final SIP call by November 22, 2016.”</p> <p>ADEQ: ADEQ proposed revisions to Regulation 19 to address the SSM SIP Call. ADEQ is currently working on a responsive summary and final rule. Adoption of amendments to Regulation 19 is anticipated fall 2016. ADEQ will propose a SIP revision following adoption of Regulation 19 revisions.</p> <p>EPA: ADEQ is required to adopt and submit amendments to Regulation 19 concerning SSM related provisions as a SIP revision to EPA as required by the SIP Call no later than November 22, 2016.</p>	End-of-Year Review	Ongoing
6	<p>Develop and submit a SIP revision addressing Regional Haze 5-year progress report requirements.</p> <p>ADEQ: A 5-year progress report was submitted to R6 in May 2015.</p> <p>EPA: EPA has received Arkansas’ Five Year Progress SIP revision, and appreciates ADEQ’s work to address the requirements.</p>	<p>Periodic Planning Calls</p> <p>End-of-Year Review</p>	Ongoing. Target date for submission will be during FY-2016.

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY (ADEQ)
AIR POLLUTION CONTROL PROGRAM SUPPORT (APCPS)
CLEAN AIR ACT: SECT.105
FY2016 End-Of-Year Review
A-00614916 (July 1, 2015 – June 30, 2016)

ADEQ Item #	SIP/Planning Activity	Output/Reporting Mechanism	Time Frame
7	<p>Develop 111d strategy.</p> <p>ADEQ: The Clean Power Plan was stayed February 9, 2016. ADEQ is not working on a 111d strategy during the stay; however, ADEQ is continuing to follow modeling efforts by the private sector of potential future and energy environmental policy scenarios. ADEQ is also reviewing the CEIP Design Details proposed rule.</p> <p>EPA: EPA appreciates ADEQ's work to date, we will provide tools and support consistent with the stay should ADEQ seek the agency's guidance on cutting carbon pollution from power plants. We will continue to support ADEQ's efforts to review & comment on the CEIP Design Details proposed rule.</p>	Periodic Planning Calls	Ongoing
8	<p>As appropriate, provide input to EPA's Regional Haze Rule revisions and/or guidance for the second planning period.</p> <p>ADEQ: ADEQ has reviewed the Regional Haze Rule proposed revisions and guidance for the second planning period and is preparing comments to the federal rule-making docket for both the proposed rule and proposed guidance.</p> <p>EPA: EPA appreciates ADEQ's input on the proposed revisions to the Regional Haze Rule and new guidance.</p>	<p>Periodic Planning Calls</p> <p>Informal and formal comments</p>	Ongoing

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY (ADEQ)
AIR POLLUTION CONTROL PROGRAM SUPPORT (APCPS)
CLEAN AIR ACT: SECT.105
FY2016 End-Of-Year Review
A-00614916 (July 1, 2015 – June 30, 2016)

ADEQ Item #	SIP/Planning Activity	Output/Reporting Mechanism	Time Frame
9	<p>Work with Region 6, as necessary, to implement local, voluntary ozone &/or PM reductions programs (i.e. Ozone Advance / PM Advance) to help achieve or maintain attainment of 2008 8-hour ozone NAAQS and 2006 and 2012 PM NAAQS.</p> <p>ADEQ: ADEQ is not currently implementing any Ozone Advance/PM Advance programs. Voluntary efforts include an Ozone Action Day program for central Arkansas and general outreach to communities.</p> <p>EPA: We appreciate ADEQ voluntary efforts and encourage the ADEQ to make use of the resources posted on the Advance website (https://www.epa.gov/advance).</p>	Periodic Planning Calls	Ongoing
10	<p>Develop and submit Emission Inventory (EI) SIP for Crittenden County portion of ozone nonattainment area.</p> <p>ADEQ: Crittenden County Emission Inventory SIP received by EPA on 9/3/2015 and approved 1/14/2016.</p> <p>EPA: We appreciate ADEQ meeting this nonattainment SIP requirement.</p>	SIP Submittal	7/20/16

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY (ADEQ)
AIR POLLUTION CONTROL PROGRAM SUPPORT (APCPS)
CLEAN AIR ACT: SECT.105
FY2016 End-Of-Year Review
A-00614916 (July 1, 2015 – June 30, 2016)

ADEQ Item #	SIP/Planning Activity	Output/Reporting Mechanism	Time Frame
11	<p>As appropriate, develop and submit redesignation requests including maintenance plans for areas with clean data.</p> <p>ADEQ: A redesignation request for Crittenden County was submitted on December 10, 2015. EPA proposed redesignation of Crittenden County on 2/10/2016 and finalized redesignation on 4/25/2016 (effective 5/25/2016).</p> <p>EPA: EPA commends ADEQ on the development, adoption and submittal of the Crittenden County 2008 8-hr Ozone Redesignation Request and Maintenance Plan. ADEQ's coordination with EPA R6 allowed for expedient redesignation of Crittenden County.</p>	<p>Periodic Planning Calls</p> <p>End-of-year review</p>	Ongoing
13	<p>Work with EPA to address any issues raised related to submitted "Threshold Revision" SIP</p> <p>ADEQ: A monitoring demonstration was submitted to EPA on July 10, 2015. ADEQ submitted a technical support document on the Threshold Revision SIP to EPA on November 30, 2015. EPA provided some initial feedback on April 27, 2016. ADEQ responded to items of concern included in the feedback on 5/26/2016.</p> <p>EPA: EPA appreciates ADEQ's continued efforts to respond to our requests for additional information and to address our noted concerns. We are currently reviewing the most recently received information, as well as, the initial SIP revisions submittal and will contact ADEQ with any additional questions or concerns.</p>	Periodic Planning Calls	Ongoing

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY (ADEQ)
AIR POLLUTION CONTROL PROGRAM SUPPORT (APCPS)
CLEAN AIR ACT: SECT.105
FY2016 End-Of-Year Review
A-00614916 (July 1, 2015 – June 30, 2016)

ADEQ Item #	SIP/Planning Activity	Output/Reporting Mechanism	Time Frame
14	<p>Submit draft, proposed, and/or final SIPs, equivalency demonstrations, and/or delegation requests, as necessary, in response to revisions to NSR rules.</p> <p>ADEQ: On February 26, 2016, APC&EC adopted the 2006 and 2012 PM_{2.5} NAAQS, the 2008 ozone and lead NAAQS, and the 2010 NO₂ and SO₂ NAAQS. With the adoption of these standards and updates made to chapter 9 of Regulation No. 19, Arkansas is able to implement these standards in the State. A SIP revision including these changes to Regulation No. 19 is anticipated for proposal in late summer 2016 and submission to EPA in late 2016.</p> <p>On September 12, 2014 ADEQ submitted a Memorandum of Agreement regarding delegation of Clean Air Act Section 112 Standards. This agreement was signed by EPA on September 18, 2014. On November 12, 2014, EPA acted to approve delegation of authority of part 63 standards for sources that are also subject to the requirements of the Title V permits program.</p> <p>Arkansas has been delegated all Part 60 standards promulgated by EPA, as amended in the Federal Register through September 14, 1981, except Subpart AAA, Subpart JJJ, Subpart JJJJ, and Subpart Dc.</p> <p>EPA: EPA appreciates ADEQ's efforts to make revisions to Regulation No. 19 to address the current NAAQS. We look forward to the receipt of the SIP revisions reflecting these changes.</p>	Submission(s) to EPA	Ongoing / Within timeframes specified in CAA / federal rules

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY (ADEQ)
AIR POLLUTION CONTROL PROGRAM SUPPORT (APCPS)
CLEAN AIR ACT: SECT.105
FY2016 End-Of-Year Review
A-00614916 (July 1, 2015 – June 30, 2016)

ADEQ Item #	SIP/Planning Activity	Output/Reporting Mechanism	Time Frame
15	<p>Work with Region 6, as appropriate and resources allow, to administer and implement the Diesel Emission Reduction grant program.</p> <p>ADEQ: ADEQ is administering and implementing the Diesel Emission Reduction grant program through its Go RED! Program. ADEQ received a one-year extension on the FY2014 grant and will continue to administer and implement this program in FY 2015. ADEQ is working with subrecipients for the FY 2015 period to ensure that their projects are completed per grant guidelines by August 31, 2016. ADEQ has also applied for the State Clean Diesel Grant for FY 2016.</p> <p>EPA: EPA appreciates ADEQ's continued participation in the DERA program and looks forward to receiving reports on the completion of the 2015 grants and progress on the 2016 grants.</p>	Periodic Planning Calls/Quarterly Reports, EOY Review	Ongoing
16	<p>Conduct SO₂ air quality planning, including the development and submittal of attainment demonstration SIPs as necessary, in accordance with EPA rules and guidance, including the final SO₂ Data Requirements Rule.</p> <p>ADEQ: In accordance with the provisions of the Data Requirements Rule, ADEQ submitted "Consent Decree" designation recommendations and has submitted all required modeling protocols in preparation for the next round of designations.</p> <p>EPA: EPA appreciates ADEQ's work to characterize air quality for use in designating areas under the 1-hour SO₂ NAAQS. We look forward to receiving additional information to support the protocol for Future Fuels and Independence.</p>	Planning calls or meetings	Ongoing

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY (ADEQ)
AIR POLLUTION CONTROL PROGRAM SUPPORT (APCPS)
CLEAN AIR ACT: SECT.105
FY2016 End-Of-Year Review
A-00614916 (July 1, 2015 – June 30, 2016)

ADEQ Item #	SIP/Planning Activity	Output/Reporting Mechanism	Time Frame
17	<p>As appropriate, submit transport SIP demonstrating that emissions do not significantly contribute to nonattainment or interfere with maintenance for the SO₂ NAAQS.</p> <p>ADEQ: Transport of SO₂ will be addressed in an infrastructure SIP submittal on the 2010 SO₂ NAAQS. We anticipate proposing this SIP in late summer 2016 and submitting the SIP to EPA following the close of the public comment period.</p> <p>EPA: We appreciate ADEQ's attention to this SIP requirement.</p>	Planning calls or meetings	Ongoing
18	<p>Submit revisions to the SIP, as necessary, within the time frame allowed by federal rules.</p> <p>ADEQ: Ongoing.</p> <p>EPA: We commend ADEQ's continued efforts in the development of timely, responsive, necessary SIP revisions.</p>	Submission(s) to EPA	Ongoing
19	<p>Implement applicable requirements of the approved SIP</p> <p>ADEQ: Ongoing.</p> <p>EPA: We commend ADEQ's continued commitment to implementation of applicable requirements of the approved SIP.</p>	Periodic Planning Calls / EOY Review	Ongoing

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY (ADEQ)
AIR POLLUTION CONTROL PROGRAM SUPPORT (APCPS)
CLEAN AIR ACT: SECT.105
FY2016 End-Of-Year Review
A-00614916 (July 1, 2015 – June 30, 2016)

ADEQ Item #	SIP/Planning Activity	Output/Reporting Mechanism	Time Frame
20	<p>Review and concur on conformity determination revisions for non-attainment and maintenance areas for transportation related criteria pollutants (e.g., ozone, CO, PM_{2.5}, PM₁₀).</p> <p>ADEQ: No conformity determinations are under consideration at this time.</p> <p>EPA: We commend ADEQ's continued commitment to the interagency consultation process, and meeting transportation conformity requirements.</p>	Conformity determination	As necessary
21	<p>Review air quality reports and take appropriate actions dealing with new areas violating attainment of any of the NAAQS.</p> <p>ADEQ: No new NAAQS violations have occurred.</p> <p>EPA: We appreciate ADEQ's continued work to identify and address new areas violating attainment of any NAAQS.</p>	Periodic Planning Calls / EOY Review	Ongoing
22	<p>Consult with and provide assistance to transportation agencies in maintenance areas to update emission inventory budgets as necessary and review transportation plans to ensure compliance with the SIP.</p> <p>ADEQ: ADEQ continues to participate in WMATS-related review of transportation plans.</p> <p>EPA: We commend ADEQ's continued commitment to the interagency consultation process, and meeting transportation conformity requirements.</p>	Participation in interagency consultation process	As necessary

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY (ADEQ)
AIR POLLUTION CONTROL PROGRAM SUPPORT (APCPS)
CLEAN AIR ACT: SECT.105
FY2016 End-Of-Year Review
A-00614916 (July 1, 2015 – June 30, 2016)

ADEQ Item #	SIP/Planning Activity	Output/Reporting Mechanism	Time Frame
23	<p>Participate in consultation and evaluation of project-specific emissions, in accordance with general conformity requirements</p> <p>ADEQ: No general conformity-related activities are underway at this time.</p> <p>EPA: We commend ADEQ's continued commitment to the interagency consultation process, and meeting general conformity requirements.</p>	Participation in interagency consultation process	As necessary
24	<p>Continue to work with Region 6 regarding delegation of portions of Part 112 Standards.</p> <p>ADEQ: On November 12, 2014, ADEQ received delegation from EPA to implement and enforce Federal Section 112 rules for Title V sources (79 FR 67073).</p> <p>EPA: We appreciate that ADEQ continues to meet their delegation commitments.</p>	Periodic Calls	Ongoing

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY (ADEQ)
AIR POLLUTION CONTROL PROGRAM SUPPORT (APCPS)
CLEAN AIR ACT: SECT.105
FY2016 End-Of-Year Review
A-00614916 (July 1, 2015 – June 30, 2016)

ADEQ Item #	Monitoring Activity	Output/Reporting Mechanism	Time Frame
25	<p>Report real time ozone, NO₂, SO₂ and PM_{2.5}, to AirNOW for cities required to report the AQI (state/local only).</p> <p>ADEQ: Ongoing.</p> <p>EPA: We appreciate ADEQ's work to report real time ozone NO₂, SO₂ and PM_{2.5} data to AirNOW.</p>	AirNow	Ongoing [present target is within 20 minutes; long-term goal is 5 minutes]
26	<p>Notify 6MM-AM prior to establishing, modifying, relocating, or discontinuing any monitor and/or site.</p> <p>ADEQ: ADEQ continues to report its intent regarding network changes via letters and the Annual Network Review.</p> <p>EPA: We thank ADEQ for continuing to communicate with 6MM-AM (Region 6 Multi-Media Division, Air Monitoring section) in advance of monitoring network system modifications. On August 28, 2015, ADEQ provided a letter requesting discontinuation of the ozone monitor at Doyle Springs Road.</p>	Letter Annual Network Plan	<p>30 days prior to change</p> <p>ADEQ: Monitoring relocation notification done within timeframe</p>
27	<p>Conduct quarterly QA checks for flow rates of PM_{2.5} Pb monitors.</p> <p>ADEQ: QA checks performed quarterly.</p> <p>EPA: We thank ADEQ for continuing to perform QA/QC and have confirmed the 2015 QA flow rates in AQS. However, AQS does not show any flow rate verifications for 2015 or 2016 and does not show any flow rate audits for Pb-PM₁₀ for 2016. Also, AQS only shows 70% of the flow rate audits for PM_{2.5} for 2016. We look forward to ADEQ submitting the rest of this required data.</p>	AQS	Quarterly

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY (ADEQ)
AIR POLLUTION CONTROL PROGRAM SUPPORT (APCPS)
CLEAN AIR ACT: SECT.105
FY2016 End-Of-Year Review
A-00614916 (July 1, 2015 – June 30, 2016)

ADEQ Item #	Monitoring Activity	Output/Reporting Mechanism	Time Frame
28	<p>Consider expanding air quality reporting and forecasting to additional cities, including particle pollution forecasting.</p> <p>EPA: We thank ADEQ for considering expanding its reporting and forecasting in AirNow to additional cities. We encourage ADEQ to keep 6MM-AM informed of any plans for extending use of AirNow.</p>	AirNow	Ongoing
29	<p>Certify 2015 NAAQS pollutant data in AQS and provide supporting documentation.</p> <p>EPA: ADEQ is correct that this is not required to be submitted within the mid-year timeframe. However, it is required to be submitted by May 1 before the end of the fiscal year. We acknowledge that ADEQ did submit a certification package for 2015 data before the May 1, 2016 deadline.</p>	Letter with appropriate AQS reports	<p>5/1/16</p> <p>ADEQ: Not within mid-year timeframe</p>
30	<p>Submit 2016 annual network plan required by 40 CFR § 58.10. The plan should address new applicable NAAQS monitoring requirements.</p> <p>ADEQ: The ANR was submitted to EPA R6 on July 14 2016. The next ANR is due July 1, 2017.</p> <p>EPA: We appreciate the work of ADEQ in developing its Annual Network Plan. ADEQ's Plan was received July 18, 2016.</p>	Annual Network Plan/ Assessment	<p>07/01/16</p> <p>ADEQ: Not within mid-year timeframe</p>

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY (ADEQ)
AIR POLLUTION CONTROL PROGRAM SUPPORT (APCPS)
CLEAN AIR ACT: SECT.105
FY2016 End-Of-Year Review
A-00614916 (July 1, 2015 – June 30, 2016)

ADEQ Item #	Monitoring Activity	Output/Reporting Mechanism	Time Frame
31	<p>Produce quality data and submit updated Quality Management Plan every five years or when major changes occur and Quality Assurance Project Plans annually or when major changes occur.</p> <p>EPA: The ICIS-Air Data QAPP was submitted April 29, 2016, and approved May 23, 2016.</p>	QMP and QAPP's	<p>60 days before expiration</p> <p>ADEQ: QAPP approved 1/16; QMP expires 2/16</p>
32	<p>Submit all monitoring data including criteria and QA to AQS, according to schedule in 40 CFR Part 58. The target data completeness rate is 75% of the potential concentration values based on the operating EPA-funded state/local monitors and their sampling schedule. Target for QA data is 75% of checks required by 40 CFR 58.</p> <p>ADEQ: Data goals met within required timeframe</p> <p>EPA: EPA appreciates ADEQ's submittal of the QA data into AQS.</p>	AQS	<p>Quarterly, no later than 90 days after the end of the calendar quarter</p> <p>CY 15 Q3 12/31/15 CY 15 Q4 03/31/16 CY 16 Q1 06/30/16 CY 16 Q2 09/30/16</p>
33	<p>Notify EPA Region 6 of any situation (such as monitor malfunction or data validation issue) that results in missing continuous data of more than 120 consecutive hours or two consecutive non-continuous samples and identify the corrective action taken to minimize the loss of data.</p> <p>ADEQ: Ongoing, No monitors have required this.</p> <p>EPA: EPA appreciates ADEQ's commitment to notifying EPA in the event of missing data collection. Further, EPA acknowledges that ADEQ has not had missing data collection during this time period.</p>	Letter or Email	As soon as possible, but no more than 14 days after the event

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY (ADEQ)
AIR POLLUTION CONTROL PROGRAM SUPPORT (APCPS)
CLEAN AIR ACT: SECT.105
FY2016 End-Of-Year Review
A-00614916 (July 1, 2015 – June 30, 2016)

ADEQ Item #	Monitoring Activity	Output/Reporting Mechanism	Time Frame
34	<p>Address and work with R6 to resolve any exceptional events.</p> <p>ADEQ: No monitors have required this.</p> <p>EPA: EPA acknowledges that ADEQ has not flagged data or notified EPA of a potential exceptional event.</p>	Data flagging in AQS, letter of notification to Region & Exceptional Event Demonstration	As necessary based on the submittal, notification, and timeline requirements in the Exceptional Events Rule's Sec. 50.14(c) No monitors have required this. No monitors have required this. No monitors have required this.
35	<p>Operate monitors for NAAQS pollutants, NCore, and PM speciation according to 40 CFR Part 58, approved monitoring plans, and/or grant agreements including QMPs and QAPPs.</p> <p>ADEQ: Ongoing</p> <p>EPA: EPA appreciates ADEQ's continued operation of its ambient air monitoring network system</p>	End-of-year review	9/30/16
36	<p>Report data from operational NCORE multi-pollutant precursor gas monitoring sites to AQS.</p> <p>ADEQ: Data reported quarterly within 30 days at the end of a quarter.</p> <p>EPA: EPA appreciates ADEQ's continued reporting of NCORE multi-pollutant precursor gas data to AQS.</p>	End-of-year review	9/30/16

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY (ADEQ)
AIR POLLUTION CONTROL PROGRAM SUPPORT (APCPS)
CLEAN AIR ACT: SECT.105
FY2016 End-Of-Year Review
A-00614916 (July 1, 2015 – June 30, 2016)

ADEQ Item #	Permitting Activity	Output/Reporting Mechanism	Time Frame
37	<p>Provide copies of Minor NSR permits and related permit documentation, including permit applications, to Region 6 upon request.</p> <p>ADEQ: Permits have been provided to Region 6 on request</p> <p>EPA: We appreciate ADEQ's timely response to our requests for Minor NSR permitting documents. EPA would also like to note that the current online permitting search/database is very helpful for locating both current and past permit documents.</p>	As requested	Ongoing
38	<p>Respond to EPA's concerns on implementation of NSR program.</p> <p>ADEQ: There are no known concerns other than comments received on individual permits. These are addressed in the final permit issuance and or response to comments document.</p> <p>EPA: We appreciate ADEQ's participation in monthly air permitting conference calls to discuss any current questions or concerns that may exist related to the NSR program. As discussed during past monthly conference calls and noted in EPA's past comments on draft permits, we have concerns related to the issuance of Minor NSR permits that do not include an adequate NAAQS demonstration as part of the permit record. We look forward to continue working with ADEQ regarding this concern to ensure the NSR program is implemented consistent with federal requirements.</p>	Monthly conference call	Within 90 days of notice from EPA

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY (ADEQ)
AIR POLLUTION CONTROL PROGRAM SUPPORT (APCPS)
CLEAN AIR ACT: SECT.105
FY2016 End-Of-Year Review
A-00614916 (July 1, 2015 – June 30, 2016)

ADEQ Item #	Permitting Activity	Output/Reporting Mechanism	Time Frame
39	<p>Provide timeliness data on NSR permits issued for new major sources and major modifications by entering data including “the application accepted date” and “the permit issuance date” in to the RBLC national database.</p> <p>ADEQ: There is no “application accepted date” in the RBLC that ADEQ can locate. The “Complete Application Date” and “Permit Issuance date” are entered in the database for all relevant permits. Four NSR permit was issued in this time period.</p> <p>EPA: We appreciate ADEQ’s commitment to enter in the permit timing information into the RBLC, while also working to identify areas for possible improvement within the clearinghouse.</p>	End-of-year review	09/30/16
40	<p>Issue NSR permits consistent with CAA requirements.</p> <p>ADEQ: There are no known issues.</p> <p>EPA: We appreciate ADEQ’s participation in monthly air permitting conference calls to discuss any issues related to specific NSR permit actions. As discussed in past calls, EPA has concerns regarding the issuance of some NSR permits, specifically Minor NSR permits because of the lack of NAAQS demonstration as part of the permit record. We look forward to continue working with ADEQ to address this concern and to ensure that all NSR permits are issued consistent with CAA requirements.</p>	Monthly conference calls; End-of-year review	Ongoing

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY (ADEQ)
AIR POLLUTION CONTROL PROGRAM SUPPORT (APCPS)
CLEAN AIR ACT: SECT.105
FY2016 End-Of-Year Review
A-00614916 (July 1, 2015 – June 30, 2016)

ADEQ Item #	Permitting Activity	Output/Reporting Mechanism	Time Frame
41	<p>Enter BACT/LAER determinations in the RBLC</p> <p>ADEQ: All determinations are sent to the clearinghouse for upload. There have been no determinations in this time period to enter.</p> <p>EPA: We appreciate ADEQ's on-going commitment to maintain current BACT/LAER information in the RBLC and their identification of information that needs to be updated and/or corrected.</p>	<p>http://mapsweb.rtpnc.epa.gov/RBLCWebb d/bb102.htm</p>	<p>BACT/LAER database entry within 30 days of final permit issuance.</p>
42	<p>Work to ensure permits contain appropriate controls to implement the EPA NAAQS standards.</p> <p>ADEQ: Permits are issued according to Arkansas rules and regulations which includes NAAQS, as implemented.</p> <p>EPA: We appreciate ADEQ's participation in monthly air permitting conference calls providing the opportunity to discuss current permit actions and the associated NAAQS demonstration requirements. As part of our oversight authority, we will continue our review of pending permit actions to identify those actions where additional discussion and revisions to control requirements is required; and we look forward to working with ADEQ to resolve any identified concerns.</p>	<p>EOY Review</p>	<p>Ongoing</p>

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY (ADEQ)
AIR POLLUTION CONTROL PROGRAM SUPPORT (APCPS)
CLEAN AIR ACT: SECT.105
FY2016 End-Of-Year Review
A-00614916 (July 1, 2015 – June 30, 2016)

ADEQ Item #	Permitting Activity	Output/Reporting Mechanism	Time Frame
43	<p>Provide Major NSR (PSD and nonattainment NSR) applications to EPA. .</p> <p>ADEQ: Applications are sent to EPA as they are received. Two NSR applications were received in this time period.</p> <p>EPA: EPA appreciates ADEQ providing application documents in a timely manner. We also would like to note that making these documents available electronically is greatly appreciated.</p>	Copy of applications	As required
44	<p>Provide draft Title V and NSR permits to EPA.</p> <p>ADEQ: All draft permits are emailed to Region 6 and are available on the ADEQ website.</p> <p>EPA: EPA appreciates ADEQ providing draft permit documents in a timely manner. We also would like to note that making these documents available electronically is greatly appreciated.</p>	Copy of draft permits	Ongoing
45	<p>Make case by case MACT determinations for all applicable sources under Section 112(g), including appropriate compliance monitoring measures, as appropriate</p> <p>ADEQ: There have not been any such determinations necessary</p> <p>EPA: We appreciate the status update and request ADEQ's continued commitment to this specific item in the futures, as applicable.</p>	Implement 40 CFR 63 process requirements	As appropriate

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY (ADEQ)
AIR POLLUTION CONTROL PROGRAM SUPPORT (APCPS)
CLEAN AIR ACT: SECT.105
FY2016 End-Of-Year Review
A-00614916 (July 1, 2015 – June 30, 2016)

ADEQ Item #	Emission Inventory Activity	Output/Reporting Mechanism	Time Frame
46	<p>Prepare and submit criteria pollutant data for the 2014 National Emissions Inventory (due December 2015).</p> <p>ADEQ: Final submittal of Point Source Inventory completed</p> <p>EPA: We appreciate ADEQ's work to provide the emissions data.</p>	<p>Submittal to NEI</p> <p>End-of-Year Review</p>	12/31/15
47	<p>As appropriate, quality assure, validate, and revise NEI data for criteria pollutants using EIS.</p> <p>ADEQ: Point Source data is currently being checked for quality assurance, validated, and revised as needed.</p> <p>EPA: We appreciate ADEQ's efforts to ensure quality emissions data.</p>	<p>Revisions to NEI</p> <p>End-of-Year Review</p>	9/30/16
48	<p>Respond to EPA comments on data prior to publication, including submission revisions as needed.</p> <p>ADEQ: ADEQ will continue to work with EPA to address any comments regarding data and will submit any revisions as necessary.</p> <p>EPA: We appreciate ADEQ's cooperation.</p>	<p>Responses</p> <p>End-of-Year Review</p> <p>Review</p>	Ongoing
49	<p>Prepare to submit criteria pollutant emissions data for the 2015 reporting year Air Emissions Reporting Requirements (due December 2016).</p> <p>ADEQ: ADEQ is currently collecting and preparing emissions data for the 2015 reporting year and plans to have all data collected and reviewed by 12/31/2016.</p> <p>EPA: We appreciate ADEQ's work to prepare for submitting the 2015 data.</p>	<p>Data collection and review</p> <p>End-of-Year Review</p>	Ongoing

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY (ADEQ)
AIR POLLUTION CONTROL PROGRAM SUPPORT (APCPS)
CLEAN AIR ACT: SECT.105
FY2016 End-Of-Year Review
A-00614916 (July 1, 2015 – June 30, 2016)

ADEQ Item #	Emission Inventory Activity	Output/Reporting Mechanism	Time Frame
50	<p>Submit available 2014 toxics inventories for large point sources via CDX.</p> <p>ADEQ: TRI (Toxic Release Inventory) data is collected by the AR Dept. of Emergency Management.</p> <p>EPA: After reviewing the Emission Inventory System (EIS) it is EPA's understanding that the available 2014 toxics emissions inventory data for large point sources was submitted.</p>	Submittal to NEI	12/31/15
51	<p>As appropriate, quality assure, validate, and revise NEI data using EIS.</p> <p>ADEQ: ADEQ plans to utilize the EIS system to review and quality assure 2015 inventory HAP and CAP data.</p> <p>EPA: We appreciate ADEQ's efforts to ensure quality emissions data.</p>	End-of-year review	09/30/16
52	<p>Collect toxics emissions data for the integrated 2015 HAP emissions inventory.</p> <p>ADEQ: ADEQ is working to collect and integrate HAP emission data into the 2015 emission inventory.</p> <p>EPA: We appreciate ADEQ's efforts to collect toxics emissions data.</p>	End-of-year review	09/30/16

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY (ADEQ)
AIR POLLUTION CONTROL PROGRAM SUPPORT (APCPS)
CLEAN AIR ACT: SECT.105
FY2016 End-Of-Year Review
A-00614916 (July 1, 2015 – June 30, 2016)

ADEQ Item #	Enforcement/Surveillance Activity	Output/Reporting Mechanism	Time Frame
53	<p>Submit a Compliance Monitoring Strategy or an update to the strategy, including the number of Major and 80% SM sources consistent with the revised Clean Air Act Stationary Source Compliance Monitoring Strategy dated July 14, 2014.</p> <p>ADEQ: Submitted 9/22/15 and approval received 12/3/15.</p> <p>EPA: Agree.</p>	ICIS-Air	Annually
54	<p>Complete the universe of planned inspections / document findings consistent with the compliance monitoring strategy (CMS). Include:</p> <ul style="list-style-type: none"> Identify universe of Majors and 80% SM <p>Complete other compliance monitoring inspections (e.g. PCEs)</p> <p>ADEQ: In process.</p> <p>EPA: Agree; ADEQ has exceeded number of projected FCEs in FY16.</p> <p>Majors: Projected 110 Actual 125</p> <p>SM80s: Projected 129 Actual 259</p>	ICIS-Air/Inspection Reports	Data input Ongoing
55	<p>Report High Priority Violations to EPA in a timely manner consistent with HPV Policy dated August 25, 2014</p> <p>ADEQ: Monthly phone calls are occurring with Region 6.</p> <p>EPA: Agree. We appreciate ADEQ's participation in monthly HPV conference calls to discuss HPV cases being pursued consistent with the HPV Policy.</p>	HPV conference call	Monthly
56	<p>State compliance monitoring and enforcement actions are conducted in accordance with federal minimum standards, state law and regulations.</p>	As required	Ongoing

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY (ADEQ)
AIR POLLUTION CONTROL PROGRAM SUPPORT (APCPS)
CLEAN AIR ACT: SECT.105
FY2016 End-Of-Year Review
A-00614916 (July 1, 2015 – June 30, 2016)

ADEQ Item #	Enforcement/Surveillance Activity	Output/Reporting Mechanism	Time Frame
	<p>ADEQ: Ongoing.</p> <p>EPA: Agree. We appreciate ADEQ's ongoing work to conduct all inspections and pursue enforcement actions in accordance with Federal and state laws, regulations & policies.</p>		
57	<p>Enter all required and accurate minimum data requirements into /ICIS-Air consistent with the January 12, 2012 Source Compliance and State Action Supporting Statement. <i>Note: A new Information Collection Request was approved January 31, 2016, and ADEQ utilized the newer document during the remainder of the FY.</i></p> <ul style="list-style-type: none"> • Review Database to ensure minimum data requirements are being entered into ICIS-Air • Review CMRs to ensure accurate minimum data requirements are being entered into ICIS-Air <p>ADEQ: Ongoing</p> <p>EPA: Agree. We appreciate ADEQ's continued work to enter, track and quality assure enforcement and compliance data to the national database, ICIS-Air.</p>	ICIS- Air/HPV conference call	<p>Monthly</p> <p>Ongoing</p>